

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 18522 and 18340

**DECLARATION OF CARMEN D. CONDE TORRES IN SUPPORT OF THE DRA
PARTIES' REPLY TO MEMORANDUM OF LAW OPPOSING DRA PARTIES'
MOTION *IN LIMINE* TO EXCLUDE CERTAIN
FRCP 26(a)(2)(C) EXPERT WITNESSES OR TESTIMONY**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

I, Carmen D. Conde Torres, hereby declare as follows:

1. I am partner and founder of C. Conde & Associates Law Offices, which serves as local counsel for Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “**Collateral Monitor**”).

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the October 6, 2021 transcript of the Remote Video-Recorded Deposition of Ojas N. Shah.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the October 15, 2021 transcript of the Remote Video-Recorded Deposition of Guarav Malhotra.

4. Attached hereto as Exhibit C is a true and correct copy of an email sent by L. Stafford to T. Mott at 5:44 p.m. Eastern Time on October 7, 2021.

Executed: October 22, 2021
In San Juan, Puerto Rico.

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LLC, as Collateral Monitor for the GDB Debt
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Certificate of Service

I hereby certify that, on October 22, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

/s/ Carmen D. Conde Torres

Carmen D. Conde Torres